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10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF CALIFORNIA  
12

13 PLANS, Inc.,	)	Case No. CIV. S-98-0266 FCD PAN
	)	
	)	Date: April 1, 2005
	)	Time: 10:00 a.m.
	)	Place: Courtroom 2
14	)	
15	)	
16 v.	)	
	)	
17 SACRAMENTO CITY UNIFIED SCHOOL	)	DEFENDANTS' JOINT NOTICE OF
DISTRICT, TWIN RIDGES ELEMENTARY	)	MOTIONS IN LIMINE
SCHOOL DISTRICT, DOES 1-100,	)	
	)	
18	)	
	)	
19 Defendants.	)	

20 PLEASE TAKE NOTICE that on April 1, 2005, at 10:00 a.m., or as soon thereafter as the  
21 matter may be heard in the above-entitled court, located at 501 I Street, Courtroom Number 2,  
22 Sacramento, California, at the direction of the Court<sup>1</sup> Defendants TWIN RIDGES ELEMENTARY  
23 SCHOOL DISTRICT and SACRAMENTO CITY UNIFIED SCHOOL DISTRICT (hereafter  
24 collectively "Districts" or "Defendants"), pursuant to Federal Rules of Evidence, rule 104, will move  
25 the Court to grant the following motions in limine:  
26

27 <sup>1</sup> Defendants file these motions in limine pursuant to the Court's direction at the February 11,  
28 2005, pretrial conference. Defendants will file further motions in limine as appropriate prior to trial, to  
be heard the first day of trial.

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- 11. Motion in Limine to Exclude Testimony by Witnesses not Previously Disclosed;
- 12. Motion in Limine to Exclude Exhibits Not Previously Disclosed or Produced;
- 13. Motion in Limine to Exclude Experts Not Properly Disclosed by Plaintiff.

Defendants will respectfully move the Court at the in limine hearing to exclude and limit evidence at trial based upon the Federal Rules of Civil Procedure and Federal Rules of Evidence. The motions will be based upon this notice of motion, the motions filed herewith, the declaration of Michelle L. Cannon, and the pleadings and papers filed herein.

Respectfully submitted,  
GIRARD & VINSON, LLP

DATED: March 11, 2005.

By           /s/ Michelle L. Cannon            
MICHELLE L. CANNON  
Attorneys for TWIN RIDGES ELEMENTARY SCHOOL DISTRICT

KRONICK MOSKOVITZ TIEDEMANN & GIRARD

DATED: March 11, 2005.

By           /s/ Susan R. Denious as authorized on 3/10/05            
SUSAN R. DENIOUS  
Attorneys for SACRAMENTO CITY UNIFIED SCHOOL DISTRICT